

Regarding Docket No. 17-258:

Skywave Wireless was founded in 2002 with the goal of providing broadband internet access to rural customers that had no access at the time. Over the years it has continually expanded its service area to places no other companies would. It currently serves approximately 1,400 square miles in northeast Nebraska.

In 2016 we started to invest in the 3.65ghz spectrum to expand and better serve our customers with greater speeds and reliability. We focused our strategy and investment on the rules for CBRS at that time. We were very excited for these new rules, and we truly believed them to be fair and give all providers a fair opportunity to purchase their own spectrum. We started to invest more into the spectrum in 2017 and had plans for a big rollout in 2018 with the hope of CBRS coming online. We planned on bidding on spectrum in our entire service area plus another 20 miles extending out in all directions.

When the NPRM came out, we quickly decided to halt investment in the spectrum until the new rules were finalized. This has limited our coverage area expansion but more importantly it has prevented unserved consumers in these new expansion areas from receiving service via the 3.65ghz spectrum. There are two proposed changes that we greatly feel will hurt consumers and rural America.

Increasing the PALs to PEAs

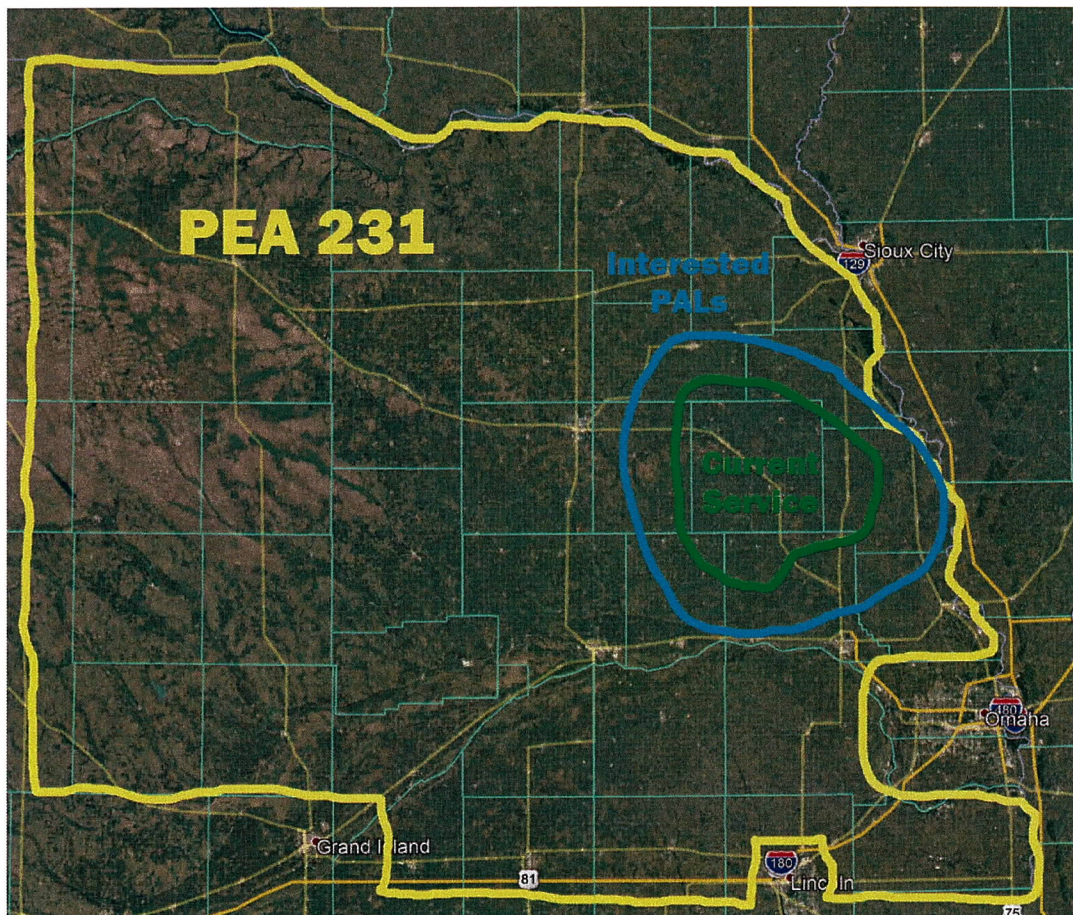
We are highly opposed to increasing the rural PAL area beyond the census tract. Increasing the PALs to PEAs only benefits the largest mobile carriers and hinders competition. It takes away what made CBRS so great for the consumers and the overall wireless industry. Creating these very large areas will essentially drive out competition as well as not allowing other industries like power, security, and education to use this spectrum at all. Skywave's position is that the PALs rule stay in place as is. This will allow for better wireless competition and keep the door open for other industries to use this spectrum.

Extending the PAL license terms from three to ten years

We are highly opposed to increasing the length of licenses to 10 years. Our belief is that this will increase the bid price and exclude those providers that service rural communities. Skywave does still believe that a three year term is the ideal length, but would not oppose a five year structure as long as the PALs are held in place. Skywave is also not in favor of a renewal expectation, but would be in favor of the license holder having a renewal credit that would allow the holder to buy back the license at a fraction of the winning bid.

Changing the PAL holder limit of 40mhz for a given geographic area

Skywave believes that it is the right size to stimulate market competition and allow a fair use of the spectrum so no one entity can monopolize in the area. By keeping the rule in place, it makes sure that at least two PAL holders can reside in any one area.



Above is a map of the proposed PEA for our service area. As you can see this area is extremely large, and the density would result in a low return on investment for a widespread deployment for larger carriers. Allowing bidding on individual PALs is an effective way to increase service availability across the area provided by smaller local and regional carriers while also providing consumers more choices.

We believe that most of the rule changes are structured only to hurt competition and benefit the top nationwide carriers. Ultimately, it will be the rural customers that will suffer due to less competition and choice of providers. Please allow us to better serve rural America and give us the tools we need to provide a better service for all Americans.

Sincerely,

Craig Schmaderer
Founder/CEO